## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

MARY VAN BRUNT-PIEHLER,

Plaintiff,

Civil Action No. 16-CV-6313-EAW-MWP

 $\nu$ .

ABSOLUTE SOFTWARE, INC., ABSOLUTE SOFTWARE CORPORATION, GEOFF HAYDON, THOMAS KENNY, and TODD AWTRY,

Defendants.

MOTION BY: Plaintiff.

**RELIEF REQUESTED:** An Order granting leave to file under seal certain

documents attached as exhibits to Plaintiff's Reply in Further Support of Plaintiff's Motion to Compel Documents Improperly Withheld Under the

Attorney-Client Privilege

**BASIS FOR RELIEF REQUESTED:** Local Rule 5.3; Stipulated Order of Confidentiality

(Dkt. No. 67); Western District of New York's

Administrative Procedures Guide.

SUPPORTING PAPERS: Memorandum of Law in Support of Motion for

Leave to File Documents Under Seal; Affirmation of Jonathan W. Ferris, sworn to June 29, 2018 with

exhibits.

**DATE AND TIME:** To be determined by the court.

Dated: June 29, 2018

## **THOMAS & SOLOMON LLP**

By: /s/ Jonathan W. Ferris

J. Nelson Thomas, Esq. Jonathan W. Ferris, Esq. *Attorneys for Plaintiffs* 693 East Avenue

Telephone: (585) 272-0540

 $nthomas@the employment attorneys.com\\jferris@the employment attorneys.com$